



October 19, 2018

Federal Communications Commission  
445 12th Street SW,  
Washington, DC 20554

To Whom it may concern,

This letter is in support of the FCC petition for rulemaking ID 1090576720580, Proceeding CG RM-11815 requesting an amendment to the Part 18 rules to enable the deployment of next-generation wireless charging technologies for light-duty electric vehicles.

WiTricity develops solutions to enable wireless power transfer over distance using its patented magnetic resonance technology and is working with major automakers and Tier 1 suppliers to bring the next generation of wireless EV charging to a commercial reality. We have developed wireless charging systems for electric vehicles that operate at power levels up to 11 kW (WPT3 power class) in the frequency range 79 – 90 kHz. Our system has been tested at an independent test lab in accordance with the test method under consideration in ANSI C63-30. The measured field strengths under conditions of maximum power transfer, maximum ground clearance and worst-case alignment were compatible with the limit proposed in the petition (74.4 dB $\mu$ A/m at 10 meter distance). We therefore strongly support the petition.

Wireless power transfer in the same frequency range at higher power levels (22 kW or WPT4) for light-duty vehicles is also possible and is being considered for the future. Data from the deployment of 11 kW systems can be used to determine if the proposed field strength limit is appropriate for future higher power systems.

Sincerely,

Morris Kesler  
Chief Technology Officer  
WiTricity Corporation